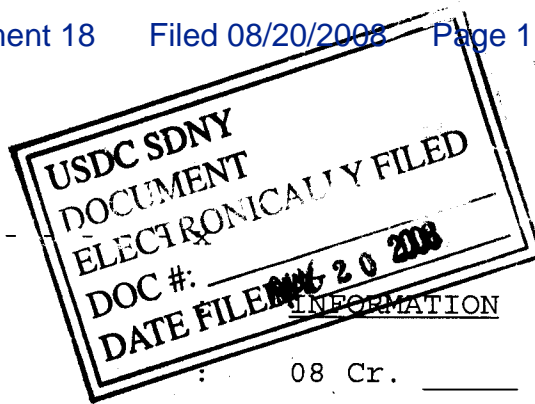


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

- v. -

08 Cr. (JFK)

YAVETTE ADAMS,

Defendant.

**08 CRIM 785**

COUNT ONE

(Conspiracy to Defraud the United States  
With Respect to Claims)

The United States Attorney charges:

1. From at least in or about 2002 up to and including on or about May 5, 2008, in the Southern District of New York and elsewhere, YAVETTE ADAMS, the defendant, together with others known and unknown, unlawfully, willfully, and knowingly did agree, combine, and conspire with others and each other to defraud the United States by obtaining and aiding to obtain the payment and allowance of false, fictitious, and fraudulent claims.

OVERT ACT

2. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York:

a. In or about May 5, 2008, YAVETTE ADAMS, the defendant, while in the Southern District of New York, placed approximately 99 envelopes containing United States Treasury checks into a mailbox designated for a non-existent apartment so that such envelopes could be retrieved by another person who was not the addressee on any of these United States Treasury checks.

(Title 18, United States Code, Section 286.)

**COUNT TWO**  
**(Conspiracy to Steal and Receive Stolen Mail Matter)**

The United States Attorney further charges:

3. From at least in or about 2002 up to and including on or about May 5, 2008, in the Southern District of New York, YAVETTE ADAMS, the defendant, together with others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1708.

4. It was a part and an object of the conspiracy that YAVETTE ADAMS, the defendant, unlawfully, willfully, and knowingly would and did steal, take, and abstract, and by fraud and deception obtain, and attempt so to obtain, from and out of the mail, a post office, and a station thereof, letter box, mail receptacle, and a mail route and other authorized depository for mail matter, and from a letter and mail carrier, a letter, postal card, package, bag, and mail, and abstract and remove from such letter, package,

bag, and mail, an article and thing contained therein, and secrete, embezzle, and destroy such letter, postal card, package, bag, and mail, and an article and a thing contained therein, in violation of Title 18, United States Code, Section 1708.

**OVERT ACT**

5. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York:

a. In or about May 5, 2008, YAVETTE ADAMS, the defendant, while in the Southern District of New York, stole approximately 99 envelopes containing United States Treasury checks and placed them into a mailbox designated for a non-existent apartment so that such envelopes could be retrieved by another person who was not the addressee on any of these United States Treasury checks.

(Title 18, United States Code, Section 371.)

**COUNT THREE**

**(Theft and Receipt of Stolen Mail Matter)**

The United States Attorney further charges:

6. From at least in or about 2002 up to and including on or about May 5, 2008, in the Southern District of New York, YAVETTE ADAMS, the defendant, unlawfully, willfully, and knowingly stole, took, and abstracted, and by fraud and deception obtained, and attempt so to obtain, from and out of the mail, a post office, and a station thereof, letter box, mail receptacle, and a mail

route and other authorized depository for mail matter, and from a letter and mail carrier, a letter, postal card, package, bag, and mail, and abstracted and removed from such letter, package, bag, and mail, an article and thing contained therein, and secreted, embezzled, and destroyed such letter, postal card, package, bag, and mail, and an article and a thing contained therein, to wit, ADAMS provided to multiple co-conspirators not named as defendants herein United States Treasury checks that were not addressed to such co-conspirators.

(Title 18, United States Code, Sections 1708 and 2.)

**COUNT FOUR**

**(Delay or Destruction of Mail and Newspapers)**

The United States Attorney further charges:

7. From at least in or about 2002 up to and including on or about May 5, 2008, in the Southern District of New York, YAVETTE ADAMS, the defendant, being a Postal Service officer and employee, unlawfully, willfully, and knowingly secreted, destroyed, detained, delayed, and opened a letter, postal card, package, bag, and mail entrusted to her and which came into her possession, and which was intended to be conveyed by mail, and carried and delivered by a carrier and other employee of the Postal Service, and forwarded through and delivered from a post office and station thereof established by authority of the Postmaster General and the Postal Service, to wit, ADAMS provided to multiple co-conspirators not named as defendants herein United States Treasury checks that

were not addressed to such co-conspirators.

(Title 18, United States Code, Sections 1703(a) and 2.)

**FORFEITURE ALLEGATIONS**

8. As a result of committing the offense alleged in Count Three of this Information, YAVETTE ADAMS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(A), and Title 28, United States Code, Section 2461, property constituting, and derived from, proceeds obtained directly and indirectly as the result of such violations, including but not limited to the following:

a. Over at least approximately \$1,000,000 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained by ADAMS as a result of the offense.

**SUBSTITUTE ASSET PROVISION**

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

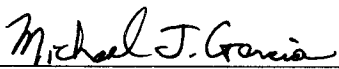
b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty, it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; and  
Title 28, United States Code, Section 2461.)

  
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MICHAEL J. GARCIA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-v.-

YAVETTE ADAMS,

Defendant.

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INFORMATION

08 Cr. \_\_\_\_\_ (JFK)

(Title 18, United States Code,  
Sections 286, 371, 1708 and 2,  
and 1703 and 2.)

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MICHAEL J. GARCIA  
United States Attorney.

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8-20-08 (WR): Filed Information and Waiver of Indictment. Deft.  
present with atty. Lance Croffoot-Suede. AUSA Daniel Levy present. Deft.  
pleads not guilty. Next Conference: 10-15-08 at 10:15 am. T/E between  
8-20-08 and 10-15-08. Bail Cont'd.

Keenan, J.